

# Exhibit A

REDACTED VERSION OF DOCUMENT  
SOUGHT TO BE SEALED

**FEDERAL PUBLIC DEFENDER**  
NORTHERN DISTRICT OF CALIFORNIA  
19TH FLOOR FEDERAL BUILDING - BOX 36106  
450 GOLDEN GATE AVENUE  
SAN FRANCISCO, CA 94102

**STEVEN G. KALAR**  
*Federal Public Defender*  
**JENYA PARKMAN**  
*Assistant Federal Public Defender*

Telephone: (415) 436-7700  
Fax: (415) 436-7706  
Email: [Jenya\\_Parkman@fd.org](mailto:Jenya_Parkman@fd.org)

November 25, 2020

Warden Steve Langford  
FCI Lompoc  
Federal Correctional Institution  
3600 Guard Road  
Lompoc, CA 93436  
*Also sent by email to LOX-Warden-S@bop.gov, LOX-ExecAssistant@bop.gov, & cayotte@bop.gov*

**Re: Compassionate-Release Request for Randall Shumpert, Register No. 78323-112**

Dear Warden Langford:

I am counsel to Randall Shumpert, a 52-year-old inmate in your custody. Mr. Shumpert was sentenced to 42 months of incarceration for wire-fraud convictions in *United States v. Shumpert*, N.D. Cal. No. 18-582. I am writing on Mr. Shumpert's behalf to request his compassionate release under 18 U.S.C § 3582(c).

Mr. Shumpert should be released because his weight, age, and race increase his risk of COVID-19 complications. First, Mr. Shumpert has a body mass index of 40, which—according to the Centers for Disease Control and Prevention (CDC)—increases his risk of severe illness from COVID-19.<sup>1</sup> During this pandemic, many courts have found that obesity is an extraordinary and compelling reason warranting release.<sup>2</sup> Second, Mr. Shumpert's age increases the risk that he would face complications from COVID-19.<sup>3</sup> Third, Mr. Shumpert is an African-American male, which also increases his risk of COVID-19 complications.<sup>4</sup>

---

<sup>1</sup> See *People with Certain Medical Conditions*, CDC, [https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html?CDC\\_AA\\_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fneed-extra-precautions%2Fgroups-at-higher-risk.html#obesity](https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fneed-extra-precautions%2Fgroups-at-higher-risk.html#obesity) (last visited November 20, 2020).

<sup>2</sup> See, e.g., *United States v. Rodriguez*, No. 3:17-CR-4477-BTM, 2020 WL 4592833, at \*2 (S.D. Cal. Aug. 5, 2020); *United States v. Jenkins*, No. 99-CR-00439-JLK-1, 2020 WL 2466911, at \*7 (D. Colo. May 8, 2020).

<sup>3</sup> See *United States v. Lewis*, No. 2:10-CR-00069-RAJ, 2020 WL 5095471, at \*5 (W.D. Wash. Aug. 28, 2020) (“According to the CDC the death rate for those aged 35-44 is nearly triple that of those 25-34 and the rate again triples for those aged 45-54.”).

<sup>4</sup> See *id.*, at \*5 (citing research “suggesting that African American males die at drastically higher rates from COVID-19 than other groups”).

November 25, 2020

Page 2

Mr. Shumpert has a sound release plan. Upon release, he would move in with his wife and children at [REDACTED] in Long Beach, CA 90804. He would pursue drug, alcohol, and gambling treatment, and attend mental-health counseling. He would also be under the supervision of the United States Probation Department.

Please confirm receipt of this letter, and feel free to contact me with any questions.

Sincerely,

Steven G. Kalar  
Federal Public Defender  
Northern District of California



JENYA PARKMAN  
Assistant Federal Public Defender

cc:

Randall Shumpert, Register No. 78323-112  
FCI Lompoc  
Federal Correctional Institution  
3600 Guard Road  
Lompoc, CA 93436